

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

**ILLINOIS COMMERCE COMMISSION:
ON ITS OWN MOTION**

Notice of Inquiry Regarding	:	18-NOI-01
Electric Vehicles	:	

**ILLINOIS CHAMBER OF COMMERCE RESPONSE TO NOTICE OF INQUIRY
REGARDING ELECTRIC VEHICLES**

The Illinois Chamber of Commerce (“The Chamber”) represents the broader business community in Illinois. Businesses large to small, manufacturers, hospitals, tech companies, construction trades, and many others depend on us to advocate for equitable policies that grow Illinois’ economy. The Chamber also works with companies in the state that make, move, and use energy. Chamber members have an interest in this proceeding as the makers and users of electric vehicles and public charging stations; stakeholders seeking to make cleaner and more efficient forms of transportation energy; and as ratepayers who are directly impacted by price increases, reliability losses, or other shifts in the energy industry.

The Illinois Commerce Commission (ICC) is right to always examine how the state can do its part in supporting the reliability and resiliency of the electric grid. As it does so, the ICC should prioritize the need for reliable, resilient and affordable electricity for ratepayers and balance the needs of industry to ensure that synergy. It should not, however, be driving policies that select one technology over another. That should be left to the markets, which prioritize competition and consumer choice. It is misguided for the ICC to be considering how to develop a regulatory framework through this Notice of Inquiry that promotes only one technology and encourages its proliferation. Consumer demand will and should determine the success of any technology or product and the business community maintains that market forces will drive implementation of electric vehicles (EVs). If a product is manufactured that consumers want to buy, the marketplace will reward it. In the case of EVs, the market is rewarding this technology and manufacturers are continuing to produce based on demand. State incentives, including proposals to spread costs among Illinois ratepayers if they use electric vehicles or not, could distort the market, misrepresenting consumer choices and hurting programs in the long run. The Chamber maintains

that the proliferation of EV charging stations should not be subsidized by the government and ratepayers. Not only is it not driven by demand, it imposes an unfair shifting of costs onto those ratepayers that have not opted to use nor can afford this technology.

Mobile phone adoption is an example of public and private industry successfully allowing the growth of a product. Multiple types of mobile phones have existed as technology and consumer demand have driven their use, with spectrum being the infrastructure they use for success. Similar to any product or technology that uses electricity, the success of mobile phone adoption and changes is due to the regulatory environment allowing private industry to drive its growth based on innovation, research and development, and consumer demand. Had government required spectrum or other telecommunications infrastructure to adapt to flip phones or the first car phones, private industry may have been stymied and not have invested in developing smart phones, which have changed our lives. Smart phone success could not have been known when the first car phone was in use.

The State, in concert with federal, state, and regional system operating partners, has a responsibility to ensure the continued safety, reliability, and efficiency of the electrical grid. Examining how to improve the electric grid to benefit consumers should be done in a technologically neutral context. How the grid can respond to more demand, how the grid can operate more efficiently, how the grid and regulatory policies governing its existence can support the onboarding of technology and innovation quickly, efficiently and competitively, are all questions that are appropriate for the State to consider. But it should not be done so in the context of a specific technology. The ICC could instead look at how the State and electric grid can onboard new technologies as the market drives their adoption and what the impact is to ratepayers. The State should be very careful to allow for flexibility and foster a regulatory process that can evolve and adapt to new innovations. Unseen technological changes, new energy resources, and environmental considerations should not be hampered because the resulting recommendations were too prescriptive to any technology.

The Illinois Chamber supports the adoption of policies that focus on the impact to the consumers, drive growth, foster competition, and protect our environment. In order to continue reducing emissions, it is going to take many different technologies and resources to reduce environmental impacts. The world will need all types of energy for a long time to come. Industry is focused on

this challenge, not just with the development of electric vehicles, but also with investments in low-carbon fuel technologies like algae-based bio-fuels, carbon capture and storage utilization, and producing aviation fuel from waste. Embracing a technology neutral approach to regulation is essential to achieving our environmental, social, and economic goals.

The private sector plays a unique and irreplaceable role in developing, financing, building, and operating new energy and technologies of the future and we should support flexible and practical policies to ensure those innovations thrive. The Illinois Chamber of Commerce respectfully requests the Illinois Commerce Commission reexamine its approach to electric vehicles and instead seek policies that allow the market to drive technology adaptation.

Dated: October 22, 2018

Respectfully submitted,



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